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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

IGOR SAHINOV, an Individual,

Plaintiff,

vs.

GEICO ADVANTAGE INSURANCE
COMPANY, a Maryland Corporation,

Defendants.

CASE NO.: 2:21-cv-00919-JCM-VCF

**STIPULATION ~~[PROPOSED]~~ ORDER TO
EXTEND PLAINTIFF'S DEADLINE TO
DISCLOSE REBUTTAL EXPERT**

IT IS HEREBY STIPULATED AND AGREED, by and between Igor Sahinov and Geico Advantage Insurance Company, that the deadline for Rebuttal Expert Disclosures set forth in the Joint Discovery Plan and Scheduling Order pursuant to FRCP 26(f)(3) (ECF NO. 17) be extended by fourteen (14) days. The parties have exchanged initial expert disclosures and the current deadline for rebuttal expert disclosures is December 27, 2021.

There is good cause for an extension because in the month of December, the Plaintiff's counsel, who is a solo practitioner, conducted extensive business travels abroad, in addition to moving his office location. All of this caused delays in retaining a rebuttal expert witness who requires additional time to provide his opinions.

The parties have agreed to extend the rebuttal expert deadline January 23, 2022, to afford Plaintiff's retained expert time to prepare a report.

Given the Parties' agreement to extend the rebuttal expert disclosures, the Parties also agreed to extend the discovery cut-off date of January 24, 2022 to February 24, 2022 to allow themselves to take the depositions of the experts.

This request is made in good faith, with good cause, is not made to delay, and is the Parties' first request to extend the rebuttal expert disclosure deadline and the discovery cut-off deadline.

Dated this 27th day of December 2021.

/s/ Jakub P. Medralla

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Dated this 27th day of December 2021.

/s/ Jonathan W. Carlson

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Attorneys for Defendant

ORDER

IT IS SO ORDERED.

DATED: 12-27-2021

IT IS HEREBY ORDERED that dispositive motions must be filed on or before March 25, 2022. The joint pretrial order is due April 25, 2022.

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

U.S. MAGISTRATE JUDGE